

FEDERAL BUREAU OF INVESTIGATION

**REGULATORY INSPECTION REPORT
(18 USC 2257)**

OF

**Real Wild Girls (RWG) Media, Inc.
2030 S. Ocean Drive, #2118
Hallandale Beach, FL 33009**

Date of Inspection: 09/17/2007

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REGULATORY INSPECTIONS REPORT

Report of: SSA Charles R. Joyner,
2257 Regulatory Inspections Program, Crimes Against Children Unit,
Violent Crimes Section, Criminal Investigative Division
Report Date: 10/16/2007
File Number: [REDACTED] (F) RWG

PRODUCER INFORMATION

An inspection was conducted of RWG Media, Inc. pursuant to 18 USC 2257 and 28 Code of Federal Regulations Part 75. The inspection was conducted at the residence of [REDACTED], owner of RWG Media, Inc. on 09/17/2007, at [REDACTED] is listed as the address for the custodian of records. [REDACTED] telephone number [REDACTED], DOB [REDACTED], SSN [REDACTED] (P-1) was present during the inspection.

INSPECTION SUMMARY

DVDs produced by RWG Media, Inc. were ordered from the internet. Contract inspectors reviewed seven DVDs and identified all performers by stage name or by still photographs taken from the video. Four of the videos did not contain the required 2257 information in the proper format. A total of 50 performers were identified as appearing in the seven DVDs. Prior to the inspection, contract inspectors printed several still photographs of each performer's face from different camera angles. Typically, the still photographs are compared with the performer identification on record to ensure the identification was, in fact, of that performer. No records were available at RWG Media, Inc. for review or comparison.

After the inspection on 09/17/2007, it was determined RWG Media, Inc. had multiple 2257 violations.

During this inspection, all provisions of 18 USC 2257 guidelines were followed by the inspection team.

FINDINGS

1. The following titles did not contain the required 2257 statements on the product:
 - a. "Backstage Pass"
 - b. "College Break in the Keys"
 - c. "Private Party"

28 CFR 75.6(a) – Any producer of any book, magazine, periodical, film, videotape...that contains one or more visual depictions of an actual human being engaged in actual sexually explicit conduct made after July 3, 1995...shall cause to be affixed to every copy of the matter a statement describing the location of the records required by this part.

2. The 2257 statement for "Out of Control #1" did not contain the address where records are maintained.

28 CFR 75.6(b)(3) – Every statement shall contain...a street address at which the records required by this part may be made available.

3. No 2257 records were available at the place of business (residence) for the following titles:

- a. "Backstage Pass"
- b. "College Break in the Keys"
- c. "Fantasy Fest 2003"
- d. "On Spring Break! Florida 2004"
- e. "Out of Control #1"
- f. "Private Party"
- g. "Wild Centerfold #1"

28 CFR 75.4 – Any producer required by this part to maintain records shall make such records available at the producer's place of business.

28 CFR 75.2(a)(1) – Any producer ...shall, for each performer ... create and maintain records containing the legal name and date of birth of each performer. The records shall also include a legible copy of a picture identification card.

4. The most recent address for Custodian of Records is [REDACTED]
[REDACTED] However, this is a large condominium complex and additional investigation was required to identify unit [REDACTED] as the residence of the owner/custodian of records.

5. No cross reference system was in place.

28 CFR Part 75.2(a)(3) – Records required to be created and maintained under this part shall be organized alphabetically, or numerically where appropriate, by the legal name of the performer (by last or family name, then first or given name)

and shall be indexed or cross referenced to each alias or other name used and to each title or identifying number of the book, magazine, film videotape, digitally or computer manipulated image, digital image, picture, URL, or other matter.

28 CFR Part 75.3 – Records required to be maintained under this part shall be categorized and retrievable to: All name(s) of each performer, including any alias, maiden name, nickname, stage name or professional name of the performer; and including the title, number, or other similar identifier...Only one copy of each picture of a performer's picture identification card and identification document must be kept as long as each copy is categorized and retrievable according to any name, real or assumed, used by each performer, and according to any title or other identifier of the matter.

PRODUCER RESPONSE TO FINDINGS

1. None.
2. None.
3. None. Mutchler advised during the inspection he kept no 2257 records or photo identifications prior to 2005. Initially, Mutchler said the records were located in Key West, but failed to provide any 2257 records for the titles reviewed. In an e-mail dated 09/26/2007, Mutchler advised he had pulled from distribution the following titles:
 - a. Out of Control 1
 - b. On Spring Break 2004
 - c. Backstage Pass 1
 - d. Fantasy Fest 2003
 - e. College Break in the Keys
 - f. Wild Centerfolds
 - g. Private Party
4. Mutchler advised he would list the correct and complete custodian of records address on his web site and future DVDs. Review of the Real Wild Girls web site revealed this has been done.
5. Mutchler advised he had implemented a cross reference system.

PRE-INSPECTION PROCEDURES

The following Pre-Inspection Procedures were followed:

1. RWG Media, Inc. was randomly selected from a data base of known producers of adult products using a computerized random selection program.
2. A sample of RWG Media, Inc. DVDs was ordered and the method of purchase was documented.
3. All products ordered were reviewed for 18 USC 2257 compliance and a pre-inspection analysis was conducted for each of the DVDs ordered.
4. All performers depicted in the videos engaging in sexually explicit conduct were identified by either a stage name or by still photographs of their likeness taken from the video.

INSPECTION PROCEDURES

The following Inspection Procedures were followed:

1. Inspection began at approximately 9:30 a.m. during regular business hours.
2. SSA Charles Joyner, the Lead Inspector, immediately identified himself and the purpose of the inspection prior to entering the residence of Mutchler.
3. SSA Joyner explained the nature and purpose of the inspection, including the limited nature of the records inspection.
4. SSA Joyner provided Mutchler with a letter explaining the parameters of the inspection and advising RWG Media, Inc. could be re-inspected at any time if violations were discovered.
5. Prior to the inspection, digital photographs were taken of the business/residence, location of 2257 records storage, and the working area assigned to the inspectors. A disc containing a total of eight photographs was placed in a 1A envelope and maintained with the case file.
6. Inspectors attempted to review the 18 USC 2257 records maintained by RWG Media, Inc. for the seven videos reviewed, to include the performers appearing therein and the cross-reference system, but it became apparent no records or cross-reference system existed.
7. The inspection concluded at approximately 11:00 p.m.
8. A digital photograph was taken of the room which served as the inspectors' work area prior to the inspectors departing the place of business/residence.

**RECORDS
VERIFICATION
SPREADSHEET**

REAL WILD GIRLS

TITLE	PRODUCTION DATE	STAGE NAME	DATE OF BIRTH	TRUE NAME
BACKSTAGE PASS	NONE	UNKNOWN FEMALE #1	NOT PROVIDED	NOT PROVIDED
BACKSTAGE PASS	NONE	UNKNOWN FEMALE #2	NOT PROVIDED	NOT PROVIDED
BACKSTAGE PASS	NONE	UNKNOWN FEMALE #3	NOT PROVIDED	NOT PROVIDED
BACKSTAGE PASS	NONE	UNKNOWN FEMALE #4	NOT PROVIDED	NOT PROVIDED
BACKSTAGE PASS	NONE	UNKNOWN FEMALE #5	NOT PROVIDED	NOT PROVIDED
BACKSTAGE PASS	NONE	UNKNOWN FEMALE #6	NOT PROVIDED	NOT PROVIDED
BACKSTAGE PASS	NONE	UNKNOWN FEMALE #7	NOT PROVIDED	NOT PROVIDED
COLLEGE BREAK IN THE KEYS	NONE	UNKNOWN FEMALE #1	NOT PROVIDED	NOT PROVIDED
COLLEGE BREAK IN THE KEYS	NONE	UNKNOWN FEMALE #2	NOT PROVIDED	NOT PROVIDED
COLLEGE BREAK IN THE KEYS	NONE	UNKNOWN FEMALE #3	NOT PROVIDED	NOT PROVIDED
COLLEGE BREAK IN THE KEYS	NONE	UNKNOWN MALE #1	NOT PROVIDED	NOT PROVIDED
FANTASY FEST 2003	12/5/2003	UNKNOWN FEMALE #1	NOT PROVIDED	NOT PROVIDED
FANTASY FEST 2003	12/5/2003	UNKNOWN FEMALE #2	NOT PROVIDED	NOT PROVIDED
FANTASY FEST 2003	12/5/2003	UNKNOWN FEMALE #3	NOT PROVIDED	NOT PROVIDED
FANTASY FEST 2003	12/5/2003	UNKNOWN FEMALE #4	NOT PROVIDED	NOT PROVIDED
FANTASY FEST 2003	12/5/2003	UNKNOWN FEMALE #5	NOT PROVIDED	NOT PROVIDED
FANTASY FEST 2003	12/5/2003	UNKNOWN MALE #1	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #1	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #2	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #3	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #4	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #5	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #6	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #7	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #8	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #9	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #10	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #11	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #12	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #13	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #14	NOT PROVIDED	NOT PROVIDED
ON SPRING BREAK! FLORIDA 2004	7/13/2004	UNKNOWN FEMALE #15	NOT PROVIDED	NOT PROVIDED

REAL WILD GIRLS

TITLE	PRODUCTION DATE	STAGE NAME	DATE OF BIRTH	TRUE NAME
OUT OF CONTROL #1	12/4/2002	UNKNOWN FEMALE #1	NOT PROVIDED	NOT PROVIDED
OUT OF CONTROL #1	12/4/2002	UNKNOWN FEMALE #2	NOT PROVIDED	NOT PROVIDED
OUT OF CONTROL #1	12/4/2002	UNKNOWN FEMALE #3	NOT PROVIDED	NOT PROVIDED
OUT OF CONTROL #1	12/4/2002	UNKNOWN FEMALE #4	NOT PROVIDED	NOT PROVIDED
PRIVATE PARTY	NONE	UNKNOWN FEMALE #1	NOT PROVIDED	NOT PROVIDED
PRIVATE PARTY	NONE	UNKNOWN FEMALE #2	NOT PROVIDED	NOT PROVIDED
PRIVATE PARTY	NONE	UNKNOWN FEMALE #3	NOT PROVIDED	NOT PROVIDED
PRIVATE PARTY	NONE	UNKNOWN FEMALE #4	NOT PROVIDED	NOT PROVIDED
PRIVATE PARTY	NONE	UNKNOWN FEMALE #5	NOT PROVIDED	NOT PROVIDED
PRIVATE PARTY	NONE	UNKNOWN FEMALE #6	NOT PROVIDED	NOT PROVIDED
WILD CENTERFOLDS #1	12/11/2003	UNKNOWN FEMALE #1	NOT PROVIDED	NOT PROVIDED
WILD CENTERFOLDS #1	12/11/2003	UNKNOWN FEMALE #2	NOT PROVIDED	NOT PROVIDED
WILD CENTERFOLDS #1	12/11/2003	UNKNOWN FEMALE #3	NOT PROVIDED	NOT PROVIDED
WILD CENTERFOLDS #1	12/11/2003	UNKNOWN FEMALE #4	NOT PROVIDED	NOT PROVIDED
WILD CENTERFOLDS #1	12/11/2003	UNKNOWN FEMALE #5	NOT PROVIDED	NOT PROVIDED
WILD CENTERFOLDS #1	12/11/2003	UNKNOWN FEMALE #6	NOT PROVIDED	NOT PROVIDED
WILD CENTERFOLDS #1	12/11/2003	UNKNOWN FEMALE #7	NOT PROVIDED	NOT PROVIDED
WILD CENTERFOLDS #1	12/11/2003	UNKNOWN FEMALE #8	NOT PROVIDED	NOT PROVIDED

PHOTO LOG/PHOTOS

CAMERA Digital Nikon LENS - Normal - N
 FILM : ASA Digital Wide - W
 ROLL No. _____ Macro - M
 Tele. - T

LIGHT - Available - A
 Elec. Strobe - E
 Flashbulb - F

Photo No.	Lens	Light	SS	f - stop	Description	Photo Log Sketch
1					Title pg - Real Wild Girls 9/17/2007	
2					front door - 2118	
3					street address - Parker Plaza 2030	
4					front of building - 2030	
5					computer - 2252 information	
6					work area	
7					work area - after inspection completed	
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REMARKS

SUBJECT TO PROTECTIVE ORDER

FBI_002697

INSPECTION COMPLIANCE DETERMINATION

RWG Media, Inc. was determined to be out of compliance with 18 USC 2257 and 28 CFR 75, and failed to resolve all violations with the exception of listing the complete and accurate custodian of records address on the web site.